



4. While discussing the problems he was having in getting the business started, Mr. Battles offered to hire me to run Pyramid 4 Aegis for him. He told me that he would pay me \$2,000.00 per month for my work.
5. We attended two of the five Community Based Residential Training sessions together. Mr. Battles told me that he was unable to attend the other three, as he had to work. I did attend the final three sessions on my own. Certification of completions for the five classes are attached as Exhibit 1.
6. While Mr. Battles and I also had a personal relationship, this was not related to the work I did for Pyramid 4 Aegis.
7. Mr. Battles asked me if I would defer my initial payment until the residential facility had clients.
8. I agreed that I would wait to get paid for my time until the facility had a client. I never agreed to volunteer my time for the work I did for Pyramid 4 Aegis. At all times, I expected to be paid for the time I worked for Pyramid 4 Aegis.
9. I am a single mother with four teenage children. I am solely responsible for the financial support for my family. I was not financially able to volunteer my time for Mr. Battles' business. At all times, I believed that my work would eventually be compensated.
10. I began working for Mr. Battles and Pyramid 4 Aegis on June 7, 2009.
11. Each day that I worked, I noted the time I started work and the time I stopped working. I also kept track of the total hours I worked. I recorded all of this time on a time sheet I created for the business. (Exhibit 2) This same time sheet was later used with other employees. (Exhibit 3)

12. In the summer and early fall of 2011, my work primarily focused on getting the business ready to accept clients.
13. During this time, I worked five hours per day, at least five days per week. I often worked on Saturdays as well. (Exhibit 2)
14. Initially, I spent a significant amount of time cleaning the facility and purchasing necessary items for the facility.
15. During this time, I also spent significant time researching the many regulations for a residential care facility to ensure that Pyramid 4 Aegis would be approved to accept a client.
16. I also spent time putting processes in place for the smooth running of the business. For example, I began drafting job descriptions (Exhibit 4), setting up Paychecks for payroll processing (Exhibit 5), and hiring the accountant for the business.
17. Marketing was also an important part of my job. Efforts I took to market Pyramid 4 Aegis included:
- a. I created a flyer about Pyramid 4 Aegis (Exhibit 6);
  - b. I sent the flyer and other information about the group home to agencies who might refer clients to Pyramid 4 Aegis (Exhibit 7);
  - c. I drove to nursing homes, mental health facilities and placement agencies to solicit for clients;
  - d. I organized and attended open houses held at the facility (Exhibit 8);
  - e. I connected Pyramid 4 Aegis with referral networks (Exhibit 9); and
  - f. I made solicitation calls on behalf of the group home (Exhibit 10).

18. In November, 2009, the first client came to stay at the facility.
19. Once the first client came to stay, it was necessary to hire staff to provide care. I was responsible for interviewing and hiring employees.
20. Although Pyramid 4 Aegis was now hiring and paying for employees to care for the new client, Mr. Battles told me that he still did not have enough money to pay me for my time. Mr. Battles asked me to continue to wait to get paid until the business was more profitable.
21. With respect to the employees, I had the following responsibilities:
- a. Employee supervision;
  - b. Creating the work schedules;
  - c. Presiding over employee meetings (Exhibit 11);
  - d. Confirmed hours worked by the various employees (Exhibit 3);
  - e. Submitting the hours to paychecks for the employees to receive their paychecks;
  - f. Filling in for employees who did not show up for work;
  - g. Issuing discipline (Exhibit 12); and
  - h. Responding to requests for information from the Unemployment Division (Exhibit 13).
22. With the clients, I also had additional responsibilities, which included the following:
- a. I was the primary contact with case managers (Exhibit 14);
  - b. I was the primary contact with doctors (Exhibit 15);
  - c. I was the primary contact with families and employers of client in the facility;
  - d. I picked up clients from jobs and brought clients to doctors' appointments;

- e. I was the primary contact with pharmacies and health care agencies for client prescriptions;
  - f. I picked up client prescriptions that were not otherwise delivered;
  - g. I shopped for groceries necessary for the clients;
23. I also acted as a representative for the group home. In this capacity I represented Pyramid 4 Aegis in court for a client that was detained. I also represented Pyramid 4 Aegis for client reviews and awards at their jobs. I was also the person contacted on behalf of Pyramid 4 Aegis by an attorney when an issue arose with a client. (Exhibit 16)
24. Approximately three months after the first client, Pyramid 4 Aegis obtained another client. I again asked Mr. Battles to be paid the money that he owed me for my work. He continued to tell me that he did not have the money and wanted me to continue to wait to be paid.
25. Approximately two months after our second client, Pyramid 4 Aegis obtained a third client. I again asked Mr. Battles to be paid the money that he owed me for my work. He continued to tell me that he did not have the money and wanted me to continue to wait to be paid.
26. Once we started having clients, I was working seven hours per day, five days per week. (Exhibit 2) I was never paid for any of this time.
27. In May, 2010, Pyramid 4 Aegis had three clients, yet I was still not getting paid for my time. I again asked Mr. Battles to pay me the money he had agreed to pay me for my time.
28. Mr. Battles again stated that he would not pay me and asked me to wait even longer.

29. I could no longer wait to be paid. Therefore, I quit working for Pyramid 4 Aegis on May 18, 2010.


30. To date, I have never been paid for any of the time I ever worked for Pyramid 4 Aegis.

31. After I left, Mr. Battles hired his daughter, Keywana Battles, to do the work I had been doing. He paid her \$2,000.00 per month for her work. (Exhibit 17)

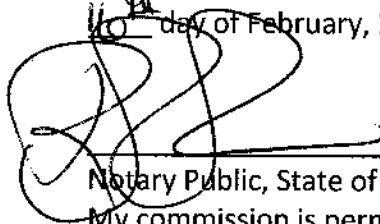
32. I have never taken any action to encourage any employee to leave the employment of Pyramid 4 Aegis.

33. I have never taken any action to encourage any client to leave Pyramid 4 Aegis. (Exhibit 14) I believe that it is in my best interest for Pyramid 4 Aegis to be successful, as I believe this will increase the likelihood that I will eventually be compensated for the time that I worked for Pyramid 4 Aegis.

Dated this 16<sup>th</sup> of February, 2012.

  
\_\_\_\_\_  
Catherine Okoro

Subscribed and sworn to before me this  
16<sup>th</sup> day of February, 2012.

  
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Notary Public, State of Wisconsin  
My commission is permanent.